

EXHIBIT 2

1 THE HONORABLE JAMAL N. WHITEHEAD
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PLAINTIFF PACITO; PLAINTIFF ESTHER;
PLAINTIFF JOSEPHINE; PLAINTIFF SARA;
PLAINTIFF ALYAS; PLAINTIFF MARCOS;
PLAINTIFF AHMED; PLAINTIFF RACHEL;
PLAINTIFF ALI; HIAS, INC.; CHURCH
WORLD SERVICE, INC.; and LUTHERAN
COMMUNITY SERVICES NORTHWEST,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; MARCO RUBIO,
in his official capacity as Secretary of State;
KRISTI NOEM, in her official capacity as
Secretary of Homeland Security; ROBERT F.
KENNEDY, JR., in his official capacity as
Secretary of Health and Human Services,

Defendants.

Case No. C25-255 JNW

**DECLARATION OF PLAINTIFF
ALI IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF MOTION FOR
PRELIMINARY INJUNCTION ON
SUPPLEMENTAL PLEADING,
ECF NO. 57**

I, Ali, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am 22 years old, and I am of sound mind.
2. I arrived in the United States on or about January 9, 2025 as a refugee through the

U.S. Refugee Admissions Program (USRAP).

DECL. OF PLAINTIFF ALI
(No. C25-255 JNW)

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

1 3. I live in Dallas, Texas.

2 4. As I previously described in my declaration, ECF 15-20 ¶ 17, Catholic Charities
3 had been assisting me when I first arrived in the United States. They initially provided me with a
4 case manager and were supposed to provide financial assistance for my first three months in the
5 United States. *Id.*

6 5. Catholic Charities was also helping me identify longer-term assistance programs
7 for recent refugees that can help me with basic necessities and finding a job. *Id.* ¶ 18.

8 6. However, one program Catholic Charities recommended to me, Matching Grant,
9 said they were no longer accepting clients. *Id.* ¶¶ 20-21. And the other, Refugee Cash Assistance,
10 was indefinitely delayed. *Id.* ¶¶ 22-23. On February 5, 2025, I received an email from the Texas
11 Office for Refugees saying that this program had been delayed because of “technical issues at the
12 federal level.” *Id.* ¶ 23.

13 7. These benefits are still unavailable to me, and the only assistance I receive is food
14 stamps.

15 8. On February 18, 2025, I received an email that my case manager is no longer with
16 Catholic Charities. I have not been connected with another case manager or received any further
17 affirmative communications from Catholic Charities.

18 9. I knew I needed to find a job, so I emailed Catholic Charities’ general support email
19 for help. The most they were able to provide was a link to a job hiring event and bus passes so I
20 could travel there.

21 10. I attended the event, but to date I have been unsuccessful in getting a job.

22 11. Right now, I’m living off of food stamps. I have no other income and no savings. I
23 am unable to pay my rent, utilities, or afford any other basic necessities until I begin working. And
24 I’m unable to pay for transportation expenses on my own, which limits my mobility and will make
25 it difficult to attend job interviews as well.

26 12. I am worried about how I will make ends meet until I am able to find a job.

I declare under Penalty of Perjury that
the forgoing is true and correct.

Executed in Dallas, Texas on March 11, 2025

R

[REDACTED]